REMARKS/ARGUMENTS

Claims 1-23 are pending in this application. Claims 1-23 stand rejected. In view of the following remarks, reconsideration and allowance of all pending claims are respectfully requested.

Objection to Drawings under 37 U.S.C. § 1.84(p)(5)

Figure 5 of the instant application has been corrected to remove the reference character "500" as required by the Office Action. No new matter has been added.

Objection to the Abstract

The Office Action objected to the abstract by alleging the abstract does not accurately reflect the invention claimed. Applicants disagree because (among other reasons) the proper content of the abstract "is a concise statement of the technical disclosure of the patent and **should include** that which is new in the art to which the invention pertains" (emphasis added). This language is permissive and thus does not require that which is new in the art to which the invention pertains. Furthermore, the language of "should include" does not necessarily **exclude** information that is not new in the art to which the invention pertains. Accordingly, applicants request removal of the objection.

Objection to the Specification

The specification of the instant application was objected to because a computer program listing was alleged to contain more than 300 lines. The listing begins on page 10 and continues to page 18, where each full page contains around 30 lines of code. Applicants counted around 235 lines for the listing, which is less than the over-300 line limit. Accordingly, redacting the code onto CD ROM is believed to be unnecessary and the objection should be removed.

Claim Objection

Claim 19 of the instant application was objected to as being a duplicate of claim 18. Claim 19 has been canceled. No new matter has been added.

Claim Rejections under 35 U.S.C. § 102(b)

The Office Action rejected claims 1-23 under 35 USC § 102(b) as being anticipated by Harold, Rusty Elliotte, "XML Bible", IDG Books Worldwide, Inc., 1999 ("Harold"). The Office Action rejected claim 1, alleging Harold teaches the "use of XML as a markup language in processing electronic documents," the "association of XML and incorporating style properties with XSL," and using "XML as a storage format for word processors."

Applicants traverse the rejection because Harold fails to teach or suggest to a method for representing style information in a markup language document, comprising: determining properties corresponding to a style that relates to at least one section of an application document; mapping the properties of the style into at least one of a markup language element, an attribute, and a value; and storing the properties of the style in the markup language document.

Harold instead teaches using an editor to write a document that is read by a browser, which then displays the document to the user. (Fig. 1-1 of Harold.) XSL can be used to interpret XML documents for display by reading XML documents, comparing them with patterns in a style sheet and outputting text when a pattern is recognized in the XSL style sheet. (Page 12 of Harold.) Thus, Harold teaches storing style information in a file that is separate from the markup language document. This is significant because properties of the style information are not stored within the markup language document.

Furthermore, Harold does not teach mapping properties corresponding to a style to markup language. Harold instead teaches using markup language to apply a style when a pattern from the markup language document is recognized in the XSL style sheet. (Page 12 of Harold.)

This teaches away from mapping the properties of the style into at least one of a markup language element, an attribute, and a value because Harold uses XSL as a source for applying style information to a markup language document for display (rather than mapping style information into markup language and storing).

Accordingly, independent claim 1 is believed to be allowable because Harold does not teach or suggest mapping the properties of the style into at least one of a markup language element, an attribute, and a value; and storing the properties of the style in the markup language document. Independent claims 9 and 16 are similar to claim 1, albeit different in important ways and are submitted to be allowable for at least the reasons by which claim 1 is allowable.

Claim 2 was rejected because Harold allegedly teaches "table styles applied to paragraphs, characters, tables and a list." Claim 2 is believed to be allowable for at least the reasons given above for claim 1. In addition, applicants traverse the rejection because Harold fails to teach or suggest determining whether the style is one of a set comprising a paragraph style, a character style, a table style, and a list style. Instead, Harold teaches an XSL style sheet for "arrang[ing] the players and their stats in a table." (Harold, page 120, first paragraph.) This is significant because Harold does not determine whether the application document comprises a style (such as a paragraph, a character, a table, or a list), but merely creates a table using standard HTML table tags. (Harold, page 120, first paragraph.) Accordingly, claim 2 is believed to be allowable.

Claim 3 was rejected because Harold allegedly teaches "overriding standard default style sheet styles, which creates custom styles for the style sheet." Claim 3 is believed to be allowable for at least the reasons given above for claim 2. In addition, applicants traverse the rejection because Harold fails to teach or suggest additional properties that are associated with each of the set of styles such that the custom styles are generated by selected one or more of the additional properties. Instead, Harold teaches using style attributes "[w]hen hand-authoring documents" to code the style attribute in XML. (Harold, p. 333.) This is significant because directly hand-

coding the style information precludes determining and mapping the properties of a style of the application document. Accordingly, claim 3 is believed to be allowable.

Claim 4 was rejected because Harold allegedly teaches "default styles." Claim 4 is believed to be allowable for at least the reasons given above for claim 1. In addition, applicants traverse the rejection because Harold fails to teach or suggest categorizing the style according to one of a set including a version of a built-in style, a latent style, and a custom style. Instead, Harold teaches using default style sheets. (Harold, p. 333.) This is significant because the style sheet information is stored separately from the application (and is thus not "built-in") and does not discuss latent styles. Furthermore the style sheet is not "built-in" to the application, because the user virtually has complete control over the contents of the style sheet. Accordingly, claim 4 is believed to be allowable.

Claim 5 was rejected because Harold allegedly teaches "latent styles." Claim 5 is believed to be allowable for at least the reasons given above for claim 4. In addition, applicants traverse the rejection because Harold fails to teach or suggest a latent style that comprises a style that is a built-in style not yet instantiated by an application. Instead, Harold teaches using default style sheets. (Harold, p. 333.) This is significant because the style sheet information is stored separately from the application (and is thus not "built-in") and does not discuss latent styles. Accordingly, claim 5 is believed to be allowable.

Claim 6 was rejected because Harold allegedly teaches, "the style attribute attached to an element to change a style in one section of the document." Claim 6 is believed to be allowable for at least the reasons given above for claim 1. As discussed above with claim 1, applicants traverse the rejection because Harold fails to teach or suggest mapping properties that correspond to a style to markup language. Accordingly, Harold does not teach or suggest further mapping an additional style. Accordingly, claim 6 is believed to be allowable.

Claim 7 was rejected because Harold allegedly teaches, "that XML may be understood by different applications and that the XML language is 'self-describing.'" Claim 7 is believed to be

allowable for at least the reasons given above for claim 1. As discussed above with claim 1, applicants traverse the rejection because Harold fails to teach or suggest storing the mapped properties that correspond to a style in the markup language document. Accordingly, Harold does not teach or suggest markup language documents having (mapped) properties of the style that are understood by an application that understands the markup language when the style is not native to the application. Accordingly, claim 7 is believed to be allowable.

Claim 8 is believed to be allowable for at least the reasons given above for claim 1.

Claim 9 is believed to be allowable for at least the reasons given above for claims 1 and 2.

Claims 10-15 are believed to be allowable for at least the reasons given above for claim 9 in combination with claims 7, 8, 6, 3, 4, and 5, respectively.

Claim 16 is believed to be allowable for at least the reasons given above for claim 1. Harold, pages 191-200, teaches validating an XML document but does not teach validating the markup language document of claim 1.

Claims 17-18 are believed to be allowable for at least the reasons given above for claim 16 in combination with claims 4 and 6, respectively.

Claim 19 has been cancelled.

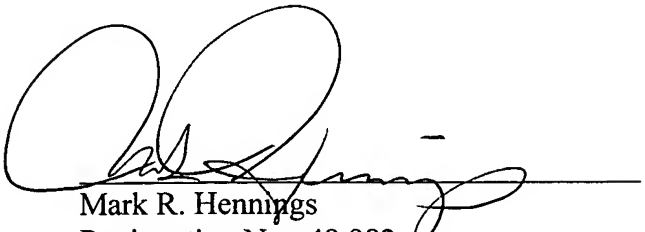
Claims 20-23 are believed to be allowable for at least the reasons given above for claim 16 in combination with claims 10, 11, 2, and 3 respectively.

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application,

the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

MERCHANT & GOULD P.C.



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